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Attorneys for Plaintiff

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION**

HH-SALT LAKE, LLC, a Utah limited
liability company,

Plaintiff,

vs.

WEST VALLEY CITY, a Utah
Municipality,

Defendant.

**JOINT STATUS REPORT RE FACT
DISCOVERY**

Civil No. 2:23-cv-00470-TS-DAO

Senior Judge Ted Stewart

Magistrate Judge Daphne A. Oberg

Pursuant to the Court's Discovery Management Order, Dkt. 28, Plaintiff HH-Salt Lake, LLC, by and through its counsel of record, and Defendant West Valley City, by and through its counsel of record, hereby submit the following Joint Status Report Regarding Fact Discovery as follows:

1. The Parties have been in settlement discussions for the past couple months, and are currently in advanced settlement discussions.

2. In an effort to save costs and streamline the discovery process, the Parties formally agreed to pause deposition discovery. *See* Dkt. 41.

3. As settlement discussions became more advanced, the Parties informally agreed to pause additional discovery efforts in an effort to reach resolution in this matter.

4. Based upon the foregoing, the Parties do not anticipate completing discovery on or before the Fact Discovery Deadline of July 19, 2024.

5. As described in the concurrently filed Stipulated Motion to Stay Discovery, the Parties request a thirty (30) day stay of all discovery in order to allow further settlement negotiations, with the option to extend the stay for an additional thirty (30) days thereafter.

6. Should the parties not reach a settlement within the time allotted for the stay, the Parties intend to jointly move to Amend the Scheduling Order to extend the fact discovery deadline by an additional ninety (90) days in order to complete remaining discovery.

DATED this 21st day of June, 2024.

/s/ Thomas B. Stockard

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/s/John L. Cooper

Signed electronically by Thomas B. Stockard
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